

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN**

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AARON, et. al.,  
Plaintiffs,

v.

RATKOWSKI, and ROY,  
Defendants.

**PROPOSED SPECIAL VERDICT FORM**  
Case No. 20 CV 01660

We the jury in the above-entitled action, answer the Special Verdict questions as follows:

**AS TO CLAIMS AGAINST DEFENDANT JOSEPH ROY FOR VIOLATING DRIVER'S PRIVACY PROTECTION ACT**

1. For each Plaintiff, did Defendant JOSEPH ROY DISCLOSE such Plaintiff's personal information from a motor vehicle record for a purpose not permitted in violation of the DPPA to the recipient (receiving address) as follows:  
*\*\*\* Email Recipient(s) will be specified based upon admitted evidence and per column \*\*\**

<b>NAME</b>	<b>Email recipient</b> If Yes, write the number 1, if No, write in 0.	<b>Email recipient</b> If Yes, write the number 1, if No, write in 0.	<b>Email recipient</b> If Yes, write the number 1, if No, write in 0.
1. Andrew Aaron			
2. Kamila Ahamed			
3. Isaiah Baldwin			
4. Jacqueline Bogenberger			
5. Khalil Coleman			
6. Anne Delessio-Parson			
7. Rachel Dulay			

8. Erik Fanning			
9. Jill Ferguson			
10. Joanna Geisler			
11. Joseph Hayes			
12. Destiney Jones			
13. Adante Jordan			
14. Mary Kachelski			
15. Sean Kafer			
16. Joseph Koepp			
17. John Larry			
18. Alex Larson			
19. Sonora Larson			
20. Lazarito Matheu			
21. Molly Nilssen			
22. Carmen Palmer			
23. Leah Porter			
24. Hector Rodriguez			
25. Oscar Rodriguez			
26. Nathan Sabel			
27. Peter Sparks			
28. Christina Vitolo-Haddad			
29. Gabriella Vitucci			
30. Oscar Walton			
31. Jayden Welch			
32. Suzanne Wells			
33. Brandon Wilborn			
34. Sonja Worthy			

2. If you find that Defendant Roy violated the DPPA in a willful or reckless manner against any Plaintiff(s) what amount of money do you believe is appropriate to deter any future misconduct? \_\_\_\_\_

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**PROPOSED SPECIAL VERDICT FORM**

v.  
Case No. 20 CV 01660

RATKOWSKI, and ROY,  
Defendants.

We the jury in the above-entitled action, answer the Special Verdict questions as follows:

**AS TO CLAIMS AGAINST DEFENDANT DOMINICK RATKOWSKI FOR VIOLATING DRIVER'S PRIVACY PROTECTION ACT**

1. For each Plaintiff, did Defendant Dominick Ratkowski **OBTAINT** such Plaintiff's personal information from a motor vehicle record for a purpose not permitted in violation of the DPPA, complete the box and write YES (Y) or NO (N) for each Plaintiff.

<b>NAME</b>	<b>If Yes, write the number 1, if No, write in the number 0</b>
1. Andrew Aaron	
2. Robert Agnew	
3. Kamila Ahamed	
4. Isaiah Baldwin	
5. Jacqueline Bogenberger	
6. Lavita Booker	
7. Rebecca Burrell (Wigley)	
8. Raine Cich	
9. Khalil Coleman	
10. Tahudah Cole	
11. Taleavia Cole	
12. Tracy Cole	
13. Steven Conklin	
14. Lauryn Cross	
15. Erik Fanning	

<b>NAME</b>	<b>If Yes, write the number 1, if No, write in the number 0</b>
16. Jessica Fenner	
17. Christine Groppi	
18. Gaige Grosskreutz	
19. Joseph Hayes	
20. Adante Jordan	
21. Mary Kachelski	
22. Sean Kafer	
23. Joseph Koepf	
24. John Larry	
25. Alex Larson	
26. Sonora Larson	
27. Van Mayes	
28. Molly Nilssen	
29. Shawn Page	
30. Carmen Palmer	
31. Oscar Rodriguez	
32. Rosalind Rogers	
33. Madeline Schweitzer	
34. Mariah Smith	
35. Peter Sparks	
36. Tiffany Stark	
37. Angel Vega	
38. Gabriella Vitucci	
39. Tristiana Walls	
40. Oscar Walton	
41. Jayden Welch	
42. Briitta Welch	
43. Brandon Wilborn	
44. Trisha Wilson	
45. Katelyn Wojnar	

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RATKOWSKI, and ROY,  
Defendants.

We the jury in the above-entitled action, answer the Special Verdict questions as follows:

**AS TO CLAIMS AGAINST DEFENDANT DOMINICK RATKOWSKI FOR VIOLATING DRIVER'S PRIVACY PROTECTION ACT**

2. For each Plaintiff, did Defendant Dominick Ratkowski USE such Plaintiff's personal information from a motor vehicle record for a purpose not permitted in violation of the DPPA, complete the box as YES (Y) or NO (N) for each Plaintiff.
3. If the answer to question #1 for ANY Plaintiff is YES, in column #2 please write down the number of times that Defendant Ratkowski USED Plaintiff's personal information from a motor vehicle record for a purpose not permitted in violation of the DPPA.

NAME	(Y) YES or (N) NO	2). If Yes, write the NUMBER of times Plaintiff's Information was USED in violation of the DPPA, If No, write in 0.
1. Andrew Aaron		
2. Robert Agnew		
3. Kamila Ahamed		
4. Isaiah Baldwin		
5. Jacqueline Bogenberger		
6. Lavita Booker		
7. Rebecca Burrell (Wigley)		
8. Raine Cich		
9. Khalil Coleman		
10. Tahudah Cole		
11. Taleavia Cole		

<b>NAME</b>	<b>(Y) YES or (N) NO</b>	<b>2). If Yes, write the NUMBER of times Plaintiff's Information was USED in violation of the DPPA, If No, write in 0.</b>
12. Tracy Cole		
13. Steven Conklin		
14. Lauryn Cross		
15. Erik Fanning		
16. Jessica Fenner		
17. Christine Groppi		
18. Gaige Grosskreutz		
19. Joseph Hayes		
20. Adante Jordan		
21. Mary Kachelski		
22. Sean Kafer		
23. Joseph Koepp		
24. John Larry		
25. Alex Larson		
26. Sonora Larson		
27. Van Mayes		
28. Molly Nilssen		
29. Shawn Page		
30. Carmen Palmer		
31. Oscar Rodriguez		
32. Rosalind Rogers		
33. Madeline Schweitzer		
34. Mariah Smith		
35. Peter Sparks		
36. Tiffany Stark		
37. Angel Vega		
38. Gabriella Vitucci		
39. Tristiana Walls		
40. Oscar Walton		
41. Jayden Welch		
42. Briitta Welch		
43. Brandon Wilborn		
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**AS TO CLAIMS AGAINST DEFENDANT DOMINICK RATKOWSKI FOR VIOLATING DRIVER'S PRIVACY PROTECTION ACT**

4. For each Plaintiff, did Defendant Dominick Ratkowski **DISCLOSE** such Plaintiff's personal information from a motor vehicle record for a purpose not permitted in violation of the DPPA to the recipient (receiving address) as follows: \*\*\* Email Recipient(s) will be specified based upon admitted evidence and per column \*\*\*

NAME	<i>Email recipient</i> If Yes, write the number 1, if No, write in 0.	<i>Email recipient</i> If Yes, write the number 1, if No, write in 0.	<i>Email recipient</i> If Yes, write the number 1, if No, write in 0.
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6. Lavita Booker			
7. Rebecca Burrell (Wigley)			
8. Raine Cich			
9. Khalil Coleman			
10. Tahudah Cole			
11. Taleavia Cole			
12. Tracy Cole			
13. Steven Conklin			

14. Lauryn Cross			
15. Erik Fanning			
16. Jessica Fenner			
17. Christine Groppi			
18. Gaige Grosskreutz			
19. Joseph Hayes			
20. Adante Jordan			
21. Mary Kachelski			
22. Sean Kafer			
23. Joseph Koepf			
24. John Larry			
25. Alex Larson			
26. Sonora Larson			
27. Van Mayes			
28. Molly Nilssen			
29. Shawn Page			
30. Carmen Palmer			
31. Oscar Rodriguez			
32. Rosalind Rogers			
33. Madeline Schweitzer			
34. Mariah Smith			
35. Peter Sparks			
36. Tiffany Stark			
37. Angel Vega			
38. Gabriella Vitucci			
39. Tristiana Walls			
40. Oscar Walton			
41. Jayden Welch			
42. Briitta Welch			
43. Brandon Wilborn			
44. Trisha Wilson			
45. Katelyn Wojnar			

5. If you find that Defendant Ratkowski violated the DPPA in a willful or reckless manner against any Plaintiff(s) what amount of money do you believe is appropriate to deter any future misconduct? \_\_\_\_\_